

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
<b>v.</b>	:	<b>Criminal Case No. 1:18-CR-457 (AJT)</b>
	:	
<b>BIJAN RAFIEKIAN, et al.</b>	:	

**DEFENDANT RAFIEKIAN'S MOTION FOR  
ADDITIONAL PEREMPTORY CHALLENGES AND A JURY QUESTIONNAIRE**

Defendant Rafiekian, through counsel, hereby respectfully moves the Court for an order (1) pursuant to Fed. R. Crim. P. 24(b) and Local Criminal Rule 24(b) granting defendants a total of sixteen (16) peremptory challenges and (2) granting the use of a written jury questionnaire. The grounds for this motion are set forth in the accompanying memorandum of law. A proposed order is attached to this motion.

Defendant respectfully requests that the Court hear this motion at a hearing set for June 18, 2019 or at such other time as the Court may direct.

Dated: May 28, 2019

Respectfully submitted,  
\_\_\_\_\_  
/s/  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on the 28th day of May 2019, true and genuine copies of Defendant's Motion for Additional Peremptory Challenges and a Jury Questionnaire was sent via electronic mail by the Court's CM/ECF system to the following:

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